

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:  
All Actions

**DEFENDANT 3M COMPANY'S  
MOTION FOR LEAVE TO TAKE  
ADDITIONAL DEPOSITIONS  
AND CONTINUE THE  
DEPOSITION OF SCOTT  
AUGUSTINE**

---

Pursuant to 16(b)(4) and 30(d) of the Federal Rules of Civil Procedure, Defendant 3M Company respectfully moves the Court for leave to take the depositions of J. Randall Benham and Brent Augustine, and to continue the deposition of Dr. Scott Augustine Randall Benham, notwithstanding the close of general causation fact discovery on March 20, 2017, for good cause shown.

3M relies on the accompanying memorandum of law in support of its motion, as well as the Declaration of Benjamin W. Hulse and the exhibits thereto, and all prior proceedings and pleadings heretofore had herein.

Dated: May 4, 2017

Respectfully submitted,

s/ Benjamin W. Hulse

Jerry W. Blackwell (MN #186867)  
Mary S. Young (MN #0392781)  
Benjamin W. Hulse (MN #0390952)  
BLACKWELL BURKE P.A.  
431 South Seventh Street  
Suite 2500  
Minneapolis, MN 55415  
Phone: (612) 343-3256  
Fax: (612) 343-3205  
Email: [blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)  
[myoung@blackwellburke.com](mailto:myoung@blackwellburke.com)  
[bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

Bridget M. Ahmann (MN #016611x)  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Phone: (612) 766-7000  
Email: [bridget.ahmann@faegrebd.com](mailto:bridget.ahmann@faegrebd.com)

**Counsel for Defendants 3M Company  
and Arizant Healthcare, Inc.**